

## UNITED STATES DISTRICT COURT

for the

District of New Mexico

United States of America

v.

Jesse Luera YOUNG

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Case No. MJ 22-1433 LF

*Defendant(s)*

FILED

United States District Court  
Albuquerque, New MexicoMitchell R. Elfers  
Clerk of Court

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 1, 2022 in the county of Bernalillo in the  
District of New Mexico, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
21 U.S.C. §§ 841(a)(1), (b)(1)(A)	Possession with Intent to Distribute 400 Grams and More of a Mixture and Substance Containing Fentanyl
21 U.S.C. §§ 841(a)(1), (b)(1)(A)	Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing Methamphetamine
18 U.S.C. § 924(c)(1)(A)(i)	Possession of a Firearm in Furtherance of a Drug Trafficking Crime
18 U.S.C. §§ 922(g)(1) and 924	Possession of a Firearm by a Convicted Felon

This criminal complaint is based on these facts:

Please see the attached affidavit of DEA Special Agent Kyle Coffey, which is incorporated by reference and has been reviewed and approved by AUSA Nora Wilson.

 Continued on the attached sheet.  
Complainant's signature

Kyle Coffey, DEA Special Agent

Printed name and title

Telephonically sworn and electronically signed.

Date: 09/01/2022  
Judge's signatureCity and state: Albuquerque, New Mexico

Laura Fashing, U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a Special Agent (SA) with the U.S. Drug Enforcement Administration (DEA), and have been since May 2020. I am assigned to the DEA's Albuquerque District Office. As a SA for the DEA, I am an investigative law enforcement officer of the United States within the meaning of 18 U.S.C. § 2510(7) and am empowered by law to conduct investigations of and to make arrests for offenses enumerated in 18 U.S.C. § 2516. As a SA with DEA, I retain the powers of enforcement as set forth in 21 U.S.C. § 878. Prior to my employment with the DEA, I was employed as a police officer with the Virginia Beach Police Department for approximately 4 years. Over the course of my career, I have accumulated the following training and experience:

- a. I graduated from the DEA Academy in Quantico, Virginia, where I received approximately 14 weeks of specialized drug-related training. The training included controlled substance identification, drug-related investigative techniques, interview and interrogation training, preparation of search warrants, tactical applications of drug enforcement, and surveillance and electronic monitoring techniques.
- b. As a Police Officer and a DEA Special Agent, I have participated in investigations of individuals and organizations trafficking heroin, cocaine, cocaine base (“crack”), marijuana, methamphetamine, fentanyl, and other controlled substances as defined in 21 U.S.C. § 801. My experience as a Special Agent includes, but is not limited to, conducting surveillance, interviewing witnesses, participating in arrests, searches, and seizures, drafting affidavits for search warrants and criminal complaints, and working with informants. I have participated in the investigation

of several drug trafficking conspiracies. As a result, I am familiar with matters including, but not limited to, the means and methods used by persons and drug trafficking organizations (DTO) to purchase, transport, store, and distribute illegal drugs and to hide profits generated from those transactions.

2. This case is being investigated by the DEA. I have personally participated in the investigation described below. I make this affidavit based on my participation in the investigation, reports, and information made available to me by other agents and Task Force Officers (“TFOs”), as well as other law enforcement authorities. This affidavit is intended only to show that there is sufficient probable cause for the requested criminal complaint and does not set forth all of my knowledge or the surrounding facts pertaining to this matter.

#### **PROBABLE CAUSE**

3. This affidavit is made in support of the issuance of a criminal complaint charging Jesse Luera YOUNG (YOUNG) with the following violations:

- 21 U.S.C. §§ 841(a)(1) and (b)(1)(A): Possession with Intent to Distribute 400 Grams and More of a Mixture and Substance Containing Fentanyl;
- 21 U.S.C. §§ 841(a)(1) and (b)(1)(A): Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing Methamphetamine;
- 18 U.S.C. § 924(c)(1)(A)(i): Possession of a Firearm in Furtherance of a Drug Trafficking Crime; and
- 18 U.S.C. §§ 922(g)(1) and 924: Possession of a Firearm by a Convicted Felon.

#### **Search Warrant at 1435 Atrisco Drive SW**

4. On September 1, 2022, Agents with the Drug Enforcement Administration (DEA)

and the Federal Bureau of Investigation (FBI) executed a federal search warrant at 1435 Atrisco Drive SW, Albuquerque, New Mexico, which is the primary residence of Jesse Luera YOUNG (YOUNG). At approximately 5:00 AM, agents secured the residence of 1435 Atrisco Drive SW and detained YOUNG. Search of the residence yielded items including the following:

- a. Electronic money counters;
- b. Plastic bags and plastic wrap, consistent with plastic bags and plastic wrap frequently used for narcotics packaging;
- c. Approximately 64.6 gross kilograms of methamphetamine, which field tested presumptive positive for methamphetamine;
- d. Approximately 102.85 gross kilograms of fentanyl, which field tested presumptive positive for fentanyl;
- e. Approximately 24 firearms of various makes and calibers located throughout the residence, to include: one Palmetto State Armory Rifle (Serial Number SCD412293). On the side of the Rifle reads “West Columbia, South Carolina.”

Affiant believes the Palmetto State Armory Rifle was manufactured in South Carolina and was transported to New Mexico.

5. As the search of the residence was being conducted, agents conducted interviews of YOUNG. Agents read YOUNG his *Miranda* warnings and YOUNG agreed to speak to the agents. YOUNG told agents he lives at the residence. YOUNG confirmed that the methamphetamine and fentanyl found in the residence belongs to him. YOUNG confirmed all firearms and ammunition located in the residence were his. YOUNG confessed to knowing he is a convicted felon and knowing that, as a felon, it is illegal for him to possess a firearm or ammunition. YOUNG confessed to selling methamphetamine and fentanyl.

6. At the time that YOUNG possessed the firearms, he had been convicted of multiple felony convictions, and knew he had been convicted of felony charges. Agents researched YOUNG's criminal history and located several felony convictions:

- a. aggravated battery in New Mexico Second Judicial District Case Number D-202-CR-2004-03331;
- b. possession of a controlled substance in New Mexico Second Judicial District Case Number D-202-CR-2017-00756;
- c. receiving or transferring a stolen motor vehicle in New Mexico Second Judicial District Case Number D-202-CR-2017-01098; and
- d. receiving or transferring a stolen motor vehicle in New Mexico Second Judicial District Case Number D-202-CR-2017-03043.

The conviction in each case occurred before the execution of the search warrant on YOUNG's residence on September 1, 2022, and each charge is punishable by more than one year of imprisonment.

7. Agents believe the firearms were not manufactured in New Mexico. Therefore, before the defendant possessed the firearms, the firearms had moved at some time from one state to another or from a foreign country to the United States.

8. Based on my training and experience, I know the amounts of located narcotics are consistent with drug trafficking and not personal use.

9. Based on my training and experience, I know that drug traffickers use firearms to facilitate their drug trafficking activities. Drug traffickers use firearms for several reasons, including but not limited to protection of themselves, their drugs, and their drug proceeds.

10. I declare under the penalty of perjury that the facts contained herein are true and

correct to the best of my knowledge.

11. AUSA Nora Wilson reviewed and approved this affidavit.

  
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Kyle Coffey  
Special Agent  
Drug Enforcement Administration

Telephonically sworn and electronically signed  
This 1st day of September, 2022.

  
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HONORABLE LAURA FASHING  
United States Magistrate Judge